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Filing date: **10/13/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

|                           |  |
|---------------------------|--|
| Proceeding                | 91223615   |
| Party                     | Defendant<br>LG Electronics Inc.   |
| Correspondence<br>Address | ROBERT J. KENNEY<br>BIRCH STEWART KOLASCH & BIRCH, LLP<br>PO BOX 747<br>FALLS CHURCH, VA 22040-0747<br><br>mailroom@bskb.com |
| Submission                | Answer   |
| Filer's Name              | Robert J. Kenney   |
| Filer's e-mail            | rjk@bskb.com, John.D.V.Ferman@bskb.com, johnst@bskb.com, mail-room@bskb.com  |
| Signature                 | /Robert J. Kenney/   |
| Date                      | 10/13/2015   |
| Attachments               | 2015-10-13 FINAL Answer to Notice of Opposition Microsoft v LG.pdf(14857 bytes )   |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

|                       |   |                                   |
|-----------------------|---|-----------------------------------|
| MICROSOFT CORPORATION | ) | Opposition No.: 91223615          |
|                       | ) |                                   |
|                       | ) | Mark: WinOZ                       |
| Opposer,              | ) | Application Serial No.: 86/298922 |
|                       | ) |                                   |
| v.                    | ) | Filing Date: June 3, 2014         |
|                       | ) | Published: May 5, 2015            |
| LG ELECTRONICS, INC.  | ) |                                   |
|                       | ) |                                   |
| Applicant.            | ) |                                   |

**ANSWER**

Applicant, LG Electronics, Inc., (“Applicant”), by and through its undersigned counsel, hereby responds to the Notice of Opposition of Microsoft Corporation (“Opposer”) as follows:

1. Applicant admits the allegations of Paragraph 1 of the Notice of Opposition.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 of the Notice of Opposition, and therefore denies them.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the Notice of Opposition, and therefore denies them.
4. Applicant admits Opposer is listed in the USPTO database as the owner of Registration Number 4,407,849 (“WINDOWS,” IC 009 and 038) and Registration Number 4,839,703 (“WINDOWS PHONE,” IC 009). Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 4 of the Notice of Opposition, and therefore denies them.
5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the Notice of Opposition, and therefore denies them.
6. Applicant lacks knowledge or information sufficient to form a belief as to the truth

of the allegations in Paragraph 6 of the Notice of Opposition, and therefore denies them.

7. Applicant admits that it seeks to register the mark “WinOZ” for mobile phones in International Class 9. Applicant denies any remaining allegations in Paragraph 7.

8. Applicant denies the allegations in Paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations in Paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations in Paragraph 10 of the Notice of Opposition.

11. Applicant denies the allegations in Paragraph 11 of the Notice of Opposition.

12. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 of the Notice of Opposition, and therefore denies them.

13. Applicant denies the allegations in Paragraph 13 of the Notice of Opposition.

14. Applicant denies any remaining allegations in the Notice of Opposition that have not been specifically admitted above.

Dated: October 13, 2015

Respectfully submitted,

By /Robert J. Kenney/  
Robert J. Kenney  
Michael T. Smith  
John D.V. Ferman  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
P.O. Box 747  
Falls Church, VA 22040-0747  
(703) 205-8000  
rjk@bskb.com; msmith@bskb.com, jferman@bskb.com  
mailroom@bskb.com

CERTIFICATE OF SERVICE

I hereby certify that on this 13<sup>th</sup> day of October, 2015, a copy of the foregoing “ANSWER” was served upon the following listed counsel by email ([gstanton@perkinscoie.com](mailto:gstanton@perkinscoie.com), [wraava@perkinscoie.com](mailto:wraava@perkinscoie.com), [hsimpkins@perkinscoie.com](mailto:hsimpkins@perkinscoie.com)), and by depositing a true copy thereof in the United States mail, postage prepaid, in an envelope addressed as follows:

Grace Han Stanton  
William C. Rava  
Holly M. Simpkins  
Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, Washington 98101

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/Tiffany Johnson/  
Tiffany Johnson